

**REMARKS**

The Office Action of January 25, 2006 has been carefully considered. Reconsideration of this application, as amended, is respectfully requested.

In summary, claims 1 and 14 have both been amended to clarify that the reference to a "line cord" as used in the present application was intended to refer to an AC power cord as described in the Specification (e.g., p. 5, lines 15-16). Claim 1 is also amended to clarify what Applicants intend relative to the term encapsulate. Support for the clarifying amendment to claim 1 is found, for example, at p. 6, lines 3-20, where the Specification states, in part, that

"The encapsulate utilized for an embodiment of the present invention may be a number of types of encapsulating materials, including epoxies, urethanes, silicones. For example, a rigid, two-part epoxy mixed in an appropriate ratio. The encapsulated portions of the power converter are preferably assembled and are then cleaned and inserted within a housing. The housing is preferably a plastic or similar polymer, such as a diallyl phthalate material, but may be any suitable housing made of other materials, including metals. Once installed in the housing, the components are covered with the encapsulating material and the assembly is placed under a vacuum in order to draw air out of any pockets or voids within the assembled components. The encapsulating material is then allowed to cure before the converter is tested." (Specification, p. 6, lines 10-20)

Turning to the Office Action, claims 1 and 14 - 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Wong et al. (U.S. Patent # 6,775,164) in combination with Cama et al. (U.S. Patent 6,211,457). Applicants also acknowledge the Examiner's allowance of claims 8 - 13. Applicants further acknowledge that claims 2 - 7 and 17 - 21 were objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims.

Considering the claims objected to first, the Office Action indicates that claims 2 - 7 are objected to as depending from a rejected claim. Claim 7 has, however, been presented

in independent form since filing of the present application. As claim 7 is presently indicated as only being objected to as being dependent upon a rejected base claim, Applicants respectfully urge that claim 7 is therefore in condition for allowance and request acknowledgement of allowance in a subsequent communication.

With respect to the remaining claims that are objected to, claims 2 – 6 and 17 – 21, Applicants respectfully urge that these claims depend from presumably allowable independent claims as set forth in the amendments above for reasons outline in the arguments below.

Turning now to the substantive rejection, claims 1 and 14 - 16 were rejected under 35 U.S.C. §103(a) as being unpatentable over Wong et al. in combination with Cama et al. Applicants respectfully traverse the rejection.

Wong was urged as teaching an electronic power converter including an encapsulated portion and circuit board in Figures 1-3 and at column 3, line 20-25. Applicants' review of Wong, particularly the sections recited as the basis for the rejection, indicates a low-voltage pulse width modulation (PWM) controller integrated circuit (IC) "typically designed to regulate the output voltage of a switching power supply." (col. 1, lines 23-24). Applicants acknowledge that Wong et al. does describe a circuit of a switching power supply employing a PWM controller IC. However, Wong et al. does not appear to disclose the invention claimed, for example, in claims 1 or 14, which recite an electronic power converter, having an encapsulated high-voltage portion, which is suitable for mounting on a printed circuit board, or a device incorporating such a converter.

Furthermore, Wong et al. specifically teaches away from the present invention where, at col. 2, lines 17-22, it states "[a]nother object of the present invention is to provide a low-voltage PWM controller IC which does not require high voltage insulation and conduction of excessive heat to the external ambient and which may therefore be packaged in a variety of low cost plastic packages, including three-terminal packages. (emphasis added). Accordingly, Wong et al. would not be understood by one of ordinary skill in the art as teaching what has been suggested as the basis for the rejection.

Cama et al. is alleged to teach "the utilization of the similar technique for an integrated connector." Applicants note that Cama et al. is directed to a shielded communication device, particularly a communication interface between an electronic camera and an

external devices such as a host computer. (col. 1, lines 5-9) Applicants also note that rejected independent claims 1 and 14 have been amended to clarify that the line cord refers to an AC line cord. As a result, Applicants respectfully submit that Cama et al. does not teach or suggest the recited "integrated connector for receiving a detachable AC line cord" as set forth, for example, in claim 1.

With respect to the proposed combination, Applicants first traverse the rejection as failing to establish *prima facie* obviousness, because there is no basis for the proposed combination that would have been understood by one of ordinary skill in the art. More specifically, the rejection urges that "[i]t would have been obvious one having an ordinary skill in the at the time the invention was made to modify Wong et al.'s power supply by technique taught by Cama et al. for the purpose of securing firm connection with external devices." However, the rejection fails to indicate where such an advantage or suggestion has been set forth. Absent such a teaching or suggestion for the combination, it would appear that Applicants' claims have been used as the "recipe" by which elements of unrelated patents have been selected to complete the hindsight reconstruction for purposes of the rejection. Applicants respectfully maintain that this is not the standard for obviousness and that absent the required teaching or suggestion, *prima facie* obviousness has not been established.

Applicants further submit, as noted above, that the proposed combination is improper as Wong et al. clearly teach away from the present invention, which is itself an indication that one of ordinary skill in the art would not have been motivated to consider the proposed combination or its application to the present invention. In view of the failure to establish *prima facie* obviousness, Applicants respectfully submit that the rejection under 35 U.S.C. §103(a) is improper, and that independent claims 1 and 14 are presently in condition for allowance.

Considering, *in arguendo*, the combination of Wong et al. and Cama et al., Applicants note that the arguable combination would nonetheless fail to teach the limitations set forth in the amended claims – particularly an electronic power converter having encapsulated high-voltage electronic circuitry and an integrated connector for receiving a detachable AC line cord therein. In view of the amendments to claims 1 and 14, Applicants respectfully submit that the claims are patentably distinguishable over the arguable combination of Wong et al. in view of Cama et al. Having traversed the

rejection of claims 1 and 14 – 16, Applicants further submit that dependent claims 2 – 6 and 17 – 21 are also presently in condition for allowance.

In view of the foregoing remarks and amendments, reconsideration of this application and allowance thereof are earnestly solicited. In the event that additional fees are required as a result of this response, including fees for extensions of time, such fees should be charged to USPTO Deposit Account No. 50-2737 for Basch & Nickerson LLP.

In the event the Examiner considers personal contact advantageous to the timely disposition of this case, the Examiner is hereby authorized to call Applicant's attorney, Duane C. Basch, at Telephone Number (585) 899-3970, Penfield, New York.

Respectfully submitted,



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